

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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MICHAEL ANDERSON, :  
Plaintiff, : Civil Action No. 2:21-cv-12990  
:  
vs. :  
WHOLE FOODS MARKET, INC., ELITE :  
INVESTIGATIONS, LTD., JOHN DOES 1-10, :  
JANE DOES 1-10, ABC CORPORATION 1-10 :  
ABC, LLC 1-10, ABC LLP 1-10, jointly, severally, :  
individually, :  
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Defendants. :  
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**TO:** Christopher Roberts, Esq.  
**Law Office of Christopher C. Roberts, LLC**  
7 Glenwood Avenue, Suite 401  
East Orange, NJ 07017  
Tel: (973) 673-0600  
Attorney for Plaintiff Michael Anderson

**COUNSEL:**

**PLEASE TAKE NOTICE** that on a date and time to be determined by the Court, counsel may be heard, the undersigned attorneys for Defendants, Whole Foods Market, Inc. and Elite Investigations, Ltd (hereafter referred to as “Defendants”) shall move before the United District Court, District of New Jersey, for an Order as follows:

1. Denying any Post-Trial Motion made by Plaintiff for a punitive damages trial;
2. Granting Defendants’ Motion sanctions and costs in opposing Plaintiff’s motion for a punitive damages trial;

3. Granting Defendants' renewal of its Motion for directed verdict as to Whole Foods pursuant to Fed. R. Civ. P. 50;
4. Granting Defendants' Motion judgment notwithstanding the verdict; and
5. Granting Defendants' Motion to enforce the settlement.

**PLEASE TAKE FURTHER NOTICE** that, in support of the within application, reliance will be placed upon the Brief and Certification of Counsel submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that the parties will meet and confer with the Court following a determination being made on all post-trial motions relative to a Court approved Order.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

**LEWIS BRISBOIS BISGAARD & SMITH, LLP**  
**Attorneys for Defendants Whole Foods Market,**  
**Inc. and Elite Investigations, Ltd.**

By: Joseph A. Gallo  
Joseph A. Gallo

Dated: December 16, 2024

Trial date: December 3, 2024

Verdict date: December 5, 2024